

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK  
CENTRAL ISLIP DIVISION

CAPRICORN MANAGEMENT  
SYSTEMS, INC.

*Plaintiff,*

*v.*

GOVERNMENT EMPLOYEES  
INSURANCE COMPANY

*Defendant.*

Case No. 2:15-cv-02926-DRH-SIL

**JOINT PROPOSED DISCOVERY PLAN**

Pursuant to the Court's Order dated May 12, 2016, the Parties met and conferred on May 27, 2016 regarding the terms of a mutually agreeable Discovery Plan and jointly propose the following for the Court's consideration:

1. The Parties shall serve Initial Disclosures pursuant to Fed. R. Civ. P. 26(a)(1) before the June 2, 2016 Initial Conference.
2. The Parties shall serve Initial Requests for Production and Interrogatories on or before June 17, 2016. Responses and Objections to these Initial Requests for Production and Interrogatories shall be served on or before July 18, 2016. The last day to serve Requests for Production, Interrogatories, and Requests for Admission is August 22, 2016.
3. Written discovery shall be completed on or before October 7, 2016.
4. Depositions of Non-Expert Witnesses shall be completed on or before November 18, 2016.

5. Any Motions to Amend Pleadings or Join Additional Parties shall be filed on or before December 2, 2016.
6. Opening Expert Reports shall be exchanged on or before December 19, 2016. Rebuttal Expert Reports shall be exchanged on or before January 20, 2017.
7. Expert Depositions shall be completed on or before February 24, 2017.
8. Dispositive Motions shall be filed on or before March 24, 2017.
9. The Parties shall submit to the Court a Joint Pre-Trial Order on or before May 8, 2017.

Date: May 31, 2016

Respectfully submitted,

**COLLEN IP**

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